

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)

Amendment of Part 95 of the)
Commission's Rules to Allow)
Organizational Licensing)
on GMRS)

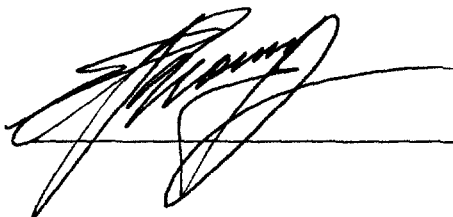
RM-9107

COMMENTS TO A NOTICE OF PROPOSED RULE MAKING

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KAD6554



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I am

- a licensed GMRS operator (KAD6554),
- an licensed Amateur Technician Class amateur operator (KB6DOL),
- a repeater owner in both of these services,
- a current member of the American Radio Relay League (ARRL),
- a volunteer Disaster Action Team (DAT) leader for the American Red Cross Disaster Services for nineteen years,
- a member of Riverside County Radio Amateur Civil Emergency Service (RACES) for ten years,
- a charter member and past Chairman of the Repeater Users Group (KAD3271) for fifteen years,
- a former member of the 220SMA coordination group for three years,
- a past president and current member of the Radio Emergency Associated Communications Teams (REACT) for thirty one years,
- an officer for the Crest REACT Team in Southern California and take part in all disasters in the Riverside/Los Angeles general area as a communicator or disaster volunteer.

I was voted the Volunteer of the Year by the Riverside County and also a national runner up for the same honor by the Transamerica Financial Corporation receiving a \$5,000 award to my designated concern. I chose the American Red Cross Communications. as the recipient They have been using this award to enhance the GMRS capability, equipment, and training for their volunteers for times of disaster.

As a disaster volunteer, I am an enhanced volunteer since I have communication skills and equipment to perform multi-duty functions in times of disaster. Normally, a disaster worker would require a communicator to "shadow" him during the performance of his duties. This is a waste of resources. It would be nice if the disaster worker were qualified in communications or if the communicator were qualified in disaster operations but the interests of both volunteer may or may not cross paths. It is a rare but valuable resource when the individual possesses both qualities and can perform them simultaneously.

While the Red Cross does have frequencies available for disaster communications, the trained Red Cross communicators are not necessarily trained and licensed in the GMRS or Amateur bands. This is where Mr. Collier's proposal becomes valuable and necessary. Amateur Radio is primarily a resource to call upon in times of disaster. Various ham radio clubs constantly maintain their skills for if and when they are called upon. Similarly, Red Cross, Salvation Army, Office of Emergency Services, and other personnel are also trained and ready to respond in times of disaster. The problem is, none of them can communicate with each other. This is a valuable waste of resources.

We need communications whereby volunteers may communicate with other disaster groups to effect the disaster recovery function. In California, we have California Law

Enforcement Mutual Aid Radio Service (CLEMARS) where police, sheriff, and fire departments may turn to for inter-agency communications. GMRS should have the ability to function in this capacity with other 501(c)(3) non-profit organizations. Mr. Collier correctly identified GMRS as the proper radio service for this need.

Limited organizational licensing proposed in RM-9107 has no adverse affect on the GMRS service, the other organization's operations, or the FCC. It is a "win-win" solution to a big problem. When properly managed, trained personnel will be able to perform their duties while maintaining proper communications for advice, management, and directives. This will alleviate licensed operators to perform other communications functions of a more technical nature to enhance and speed disaster recovery operations. no longer will a valuable ham be required to "shadow" a volunteer worker or stand by unnecessarily at a shelter "in case" they are needed. He may be replaced with a GMRS radio sitting there "in case" it is needed. As we all know, volunteers are hard to come by and this could result in effectively doubling the much sought after volunteer base.

Mr. Collier has obviously put much thought into his proposal making it workable for the commission also. Licensing, as he described it, would be easier to manage by the commission and the organization alike. He has properly addressed fee structure, operator limits, training requirements, 501(c)(3) documentation requirements, and frequency allocation. The Rules and Regulations will be easier to manage by placing the responsibility upon the shoulders of the organization and their operators. Training is essential. Frequency policing and compliance will be enhanced as more users will be monitoring it. A good thing is not something an organization will abuse or ignore. This will allow FCC personnel better use of their manpower resources toward other functions.

There will undoubtedly be opposition by some to this proposal. One must ask what their motive is and how will they benefit from opposing such a simple and needed answer to a serious and life-threatening question. I am in favor of the proposal and have shown my motive - better communications in times of disaster and special events by approved non-profit organizations recognized under IRS 501(c)(3). The FCC need not concern itself with who is qualified or not. The IRS shall perform that function for you.

I would suggest and recommend the frequency allocated to this proposal include simplex only operation on all the GMRS interstitial frequencies and simplex or repeater operation on 462.675Mhz and 462.600Mhz including allowing unspecified repeater locations. The use of the frequency should not be limited to only disaster communications now be limited to only 462.675Mhz. It should also allow for fund raising activities, community service events, testing, and other necessary inter-organization communications.

Allowing these organizations the use and licensing of the GMRS will greatly enhance communications for all concerned. I request your favorable endorsement for RM-9107.